

## **EXHIBIT A**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

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LAILONA M. RHODES,

Plaintiff,

- against -

HOWARD LEE LUIS and CHECHE DISPATCH  
SOLUTIONS, LLC,

Defendants.

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**SUMMONS**

Index No.

Date Purchased:

Plaintiff designates KINGS  
County as place of trial.

Basis of venue: CPLR 503(a).

Plaintiff resides at:

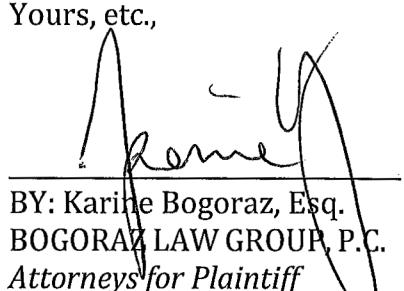
51 Quincy Street, Apt. # 1A  
Brooklyn, N.Y. 11238

**To the above-named Defendants:**

**YOU ARE HEREBY SUMMONED** to answer the Complaint in this action and to serve a copy of your Answer, or, if the Complaint is not served with this Summons, to serve a Notice of Appearance, on the Plaintiff's Attorneys within twenty (20) days of service (or within thirty (30) days after the service is complete if this Summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Complaint.

Dated: September 7, 2021  
Brooklyn, N.Y.

Yours, etc.,

  
\_\_\_\_\_  
BY: Karine Bogoraz, Esq.  
BOGORAZ LAW GROUP, P.C.  
Attorneys for Plaintiff  
3820 Nostrand Avenue, Suite 106  
Brooklyn, N.Y. 11235  
(646) 809-1616  
Our File #: 19-2336

To: HOWARD LEE LUIS  
102 Chatman Lane  
Texarkana, TX 75501

CHECHE DISPATCH SOLUTIONS, LLC  
c/o Patrick L. Ondieki  
3118 San Frando Drive  
Arlington, TX 76010

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS-----X  
LAILONA M. RHODES,

Index No.

Plaintiff,

**VERIFIED COMPLAINT**

- against -

HOWARD LEE LUIS and CHECHE DISPATCH  
SOLUTIONS, LLC,

Defendants.

-----X

Plaintiff, LAILONA M. RHODES, by her attorneys, BOGORAZ LAW GROUP, P.C., complaining of the Defendants herein named, respectfully complains to this Court and alleges as follows:

1. At all times hereinafter mentioned, the Plaintiff, LAILONA M. RHODES, is a resident of the County of Kings, in the City and State of New York.

2. At all times hereinafter mentioned, the Defendant, HOWARD LEE LUIS (hereinafter, "LEWIS"), is a resident of the County of Bowie, State of Texas.

3. At all times hereinafter mentioned, the Defendant, CHECHE DISPATCH SOLUTIONS, LLC (hereinafter, "DISPATCH"), was, and still is, a limited liability company duly organized and existing under the laws of the State of Texas.

4. That on or about October 10, 2018, Defendant, DISPATCH, was the registered owner of a 2006 freightliner tractor truck bearing Texas State license plate number 'R355061.'

5. That on or about October 10, 2018, Defendant, DISPATCH, managed, maintained, and controlled the 2006 freightliner tractor truck bearing Texas State license plate number 'R355061.'

6. That on or about October 10, 2018, Defendant, DISPATCH, supervised the 2006 freightliner tractor truck bearing Texas State license plate number 'R355061.'

7. That on or about October 10, 2018, Defendant, LEWIS, was the operator of a 2006 freightliner tractor truck bearing Texas State license plate number 'R355061.'

8. That on or about October 10, 2018, Defendant, LEWIS, was the operator of the 2006 freightliner tractor truck bearing Texas State license plate number 'R355061,' with the knowledge, permission, and consent of Defendant, DISPATCH.

9. That on or about October 10, 2018, Defendant, LEWIS, was employed by Defendant, DISPATCH.

10. That on or about October 10, 2018, Defendant, LEWIS, was the operator of the 2006 freightliner tractor truck bearing Texas State license plate number 'R355061,' while in the course of his employment for the Defendant, DISPATCH.

11. That on or about October 10, 2018, Plaintiff, LAILONA M. RHODES, was the lawful occupant of a 2004 FORD motor vehicle bearing New York State license plate number 'GRM1161.'

12. On or about October 10, 2018, and at all other times herein mentioned, the streets and roads in the area of Quincy Street, at or near its intersection with Classon Avenue, in the County of Kings, City and State of New York, was, and still is, a public road, highway, and thoroughfare, available for public use and public travel.

13. That on or about October 10, 2018, Defendant, LEWIS, was operating the 2006 freightliner tractor truck bearing Texas State license plate number 'R355061,' on Quincy Street, at or near its intersection with Classon Avenue, in the County of Kings, City and State of New York.

**14.** That on or about October 10, 2018, Plaintiff, LAILONA M. RHODES, lawfully occupied the 2004 FORD motor vehicle bearing New York license plate number 'GRM1161,' which was parked on Quincy Street, at or near its intersection with Classon Avenue, in the County of Kings, City and State of New York.

**15.** On or about October 10, 2018, at approximately 5:48 P.M., the 2006 freightliner tractor truck bearing Texas State license plate number 'R355061,' owned by Defendant, DISPATCH, and operated by Defendant, LEWIS, came into contact with the parked 2004 FORD motor vehicle bearing New York license plate number 'GRM1161,' lawfully occupied by Plaintiff, LAILONA M. RHODES, on Quincy Street, at or near its intersection with Classon Avenue, in the County of Kings, City and State of New York.

**16.** That said car accident was due solely and wholly to the negligence, carelessness, and/or recklessness, of the Defendants, in their ownership, operation, maintenance, management, leasing, and/or control of said motor vehicles, all without any fault, nor negligence, nor assumption of risk, nor lack of care, nor of any other culpable conduct on this Plaintiff contributing thereto.

**17.** That Defendant, DISPATCH, did negligently entrust the 2006 freightliner tractor truck bearing Texas State license plate number 'R355061,' by failing to research, and/or by inadequately researching, driver qualifications, or the driving ability, or the driver's capacity for operating that type of motor vehicle used.

**18.** That Defendant, DISPATCH, was negligent in maintaining and/or repairing the 2006 freightliner tractor truck bearing Texas State license plate number 'R355061.'

**19.** That Defendant, DISPATCH, was negligent in its hiring, and retainment, of personnel who did not possess the skills and qualifications needed to rent or entrust the 2006 freightliner tractor truck bearing Texas State license plate number 'R355061.'

**20.** That solely as a result of the foregoing motor vehicle accident, dated October 10, 2018, the Plaintiff, LAILONA M. RHODES, sustained severe and serious personal injuries, and has been caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief, some of these injuries are permanent and lasting in their nature. Plaintiff has been rendered sick, sore, lame, and disabled. Plaintiff has been incapacitated from pursuing her usual vocations and avocations; and will, in the future be required to seek, obtain, and undergo hospital care, potential surgical care, medical care, attention, and medical treatment, in an effort to be cured of these physical and mental injuries, and to expend, and become obligated to expend sums of money in connection with the treatment of these injuries.

**21.** Plaintiff, LAILONA M. RHODES, is qualified to bring this action under the New York State Insurance Law in that Plaintiff has sustained serious injuries, resulting in: significant disfigurement; a permanent loss of use of body organ, member, function, or system; a significant limitation of use of a body organ, member, function, or system; a permanent consequential limitation of use of a body organ, member, function, or system; and, in addition, has sustained other injuries, which may be of a non-permanent nature, but which have prevented Plaintiff from performing substantially all of plaintiff's usual and customary activities for a period of at least 90 days out of the first 180 days following the above-mentioned motor vehicle accident.

**22.** That Plaintiff, LAILONA M. RHODES, has sustained serious injuries as defined by § 5102(d) of the Insurance Law of the State of New York; and has suffered losses greater than the basic economic losses, as defined by § 5104 of the Insurance Law of the State of New York.

**23.** This legal action falls within one or more of the exceptions as set forth in C.P.L.R. § 1602 and Defendants are potentially liable for the full amount of any Judgment or Award herein made.

**24.** This Court has jurisdiction over all Defendants pursuant to New York Vehicle and Traffic Law Section 253.

**25.** By reason of the foregoing, plaintiff has been damaged in the sum as encompassed by Statute and by law as set forth in C.P.L.R. § 3017, plus costs and disbursements of this matter, for all damages as encompassed by the statute and by the laws set forth under C.P.L.R. § 3017, with the provision that the amount of damages sought herein exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction herein.

**WHEREFORE**, Plaintiff demands judgment against Defendants, DISPATCH and LEWIS, CARDONA, in amounts that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with attorney's fees and the costs and Disbursements of this action, with interest from the date of this incident.

Dated: September 7, 2021  
Brooklyn, N.Y.

Yours, etc.,

*Karine*

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BY: Karine Bogoraz, Esq.  
BOGORAZ LAW GROUP, P.C.  
*Attorneys for Plaintiff*  
3820 Nostrand Avenue, Suite 106  
Brooklyn, N.Y. 11235  
(646) 809-1616  
Our File #: 19-2336

VERIFICATION

STATE OF NEW YORK )  
                          ) SS.:  
COUNTY OF KINGS      )

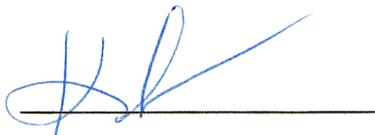
LAILONA M. RHODES, being duly sworn, deposes and says:

I am the Plaintiff in the within action.

I have read the foregoing SUMMONS and COMPLAINT and know the contents thereof: the same is true to my knowledge, except as to those matters alleged on information and belief, and as to those matters. I believe them to be true to the best of my knowledge.



Sworn to before me this  
21 day of September, 2021



NOTARY PUBLIC

KRISTINA SALAVATOV,  
Notary Public, State of New York  
Reg. No. 015A6372553  
Qualified in Kings County,  
Commission Expires 03/19/2021